# UNITED STATES BANKRUPTCY COURT DISTRICT OF MINNESOTA

In re: Jointly Administered under Case No. 08-45257

Petters Company, Inc., et al., Court File No. 08-45257
Debtors.

(includes: Court Files Nos.: Petters Group Worldwide, LLC; 08-45258 (GFK) PC Funding, LLC; 08-45326 (GFK) Thousand Lakes, LLC: 08-45327 (GFK) SPF Funding, LLC; 08-45328 (GFK) PL Ltd., Inc.; 08-45329 (GFK) Edge One LLC; 08-45330 (GFK) MGC Finance, Inc.; 08-45331 (GFK) PAC Funding, LLC; 08-45371 (GFK) Palm Beach Finance Holdings, Inc.) 08-45392 (GFK)

> Chapter 11 Cases Judge Gregory F. Kishel

Douglas A. Kelley, in his capacity as the court-appointed Chapter 11 Trustee of Debtors Petters Company, Inc. and PL Ltd., Inc.,

Plaintiff,

vs. ADV. NO. 10-04396

Westford Special Situations Master Fund, L.P.; et al.,

Defendants.

# AMENDED NOTICE OF APPEARANCE AND REQUEST FOR SERVICE NOTICES AND PAPERS

PLEASE TAKE NOTICE that, pursuant to section 1109(b) of Title 11 of the United States Code (the "Bankruptcy Code") and Rule 9010 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), Tara A. Fumerton of Jones Day, located at the address listed below, hereby enters her appearance in the above-captioned, jointly administered cases as counsel for Defendants Westford Special Situations Fund L.P.; Westford Asset Management,

LLC; Epsilon Global Active Value Fund L.P.; Epsilon Global Active Value Fund II, L.P.;

Epsilon Global Active Value Fund II-B, L.P.; Epsilon Investment Management, LLC; and Steve

Goran Stevanovich (collectively the "Epsilon/Westford Defendants").

Pursuant to Bankruptcy Rules 2002, 3017, and 9007, the undersigned requests that an

entry be made on the Clerk's Matrix in these jointly administered cases and that all notices given

or required to be given and all papers served or required to be served in these jointly

administered cases by the Debtors, the Court or any other party in interest be given to and served

upon:

Tara A. Fumerton JONES DAY

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Chicago, IL 60601

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PLEASE TAKE FURTHER NOTICE that, pursuant to section 1109(b) of the

Bankruptcy Code, this request includes not only the notices and papers referred to in the

Bankruptcy Rules specified above, but also includes, without limitation, all orders and notices of

any application, motion, petition, pleading, request, complaint, or demand, statement of affairs,

operating reports, schedules of assets and liabilities, whether formal or informal, whether written

or oral, and whether transmitted or conveyed by mail, courier service, hand delivery, telephone

facsimile transmission, telegraph, telex, or otherwise filed or made in these jointly administered

cases.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Request for

Service of Notices and Papers shall not be deemed or construed to be a waiver of the

Epsilon/Westford Defendants' rights: (a) to have final orders in non-core matters entered only

after de novo review by a District Judge; (b) to trial by jury in any proceeding so triable in this

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case or in any case, controversy or proceeding related to this case; (c) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (d) of any other rights, claims, actions, setoffs or recoupments to which the Epsilon/Westford Defendants collectively are, or individually is, or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments the Epsilon/Westford Defendants expressly reserve.

Dated: January 28, 2011 /e/ Tara A. Fumerton

Robert T. Kugler (# 0194116) Bryant D. Tchida (# 0314298) Peter J. Schwingler (# 0388909) **LEONARD STREET & DEINARD** 

Professional Association 150 South Fifth Street, Suite 2300 Minneapolis, MN 55402 Telephone: (612) 335-1645 Facsimile: (612) 335-1657

# Admitted pro hac vice:

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Attorneys for Defendants Westford Special Situations Fund L.P.; Westford Asset Management, LLC; Epsilon Global Active Value Fund L.P.; Epsilon Global Active Value Fund II, L.P.; Epsilon Global Active Value Fund II-B, L.P.; Epsilon Investment Management, LLC; and Steve Goran Stevanovich

# UNITED STATES BANKRUPTCY COURT

#### DISTRICT OF MINNESOTA

In re: **Jointly Administered under** Case No. 08-45257 Petters Company, Inc., et al., Court File No. 08-45257 Debtors. (includes: Court Files Nos.: Petters Group Worldwide, LLC; 08-45258 (GFK) PC Funding, LLC; 08-45326 (GFK) Thousand Lakes, LLC: 08-45327 (GFK) SPF Funding, LLC; 08-45328 (GFK) PL Ltd., Inc.; 08-45329 (GFK) Edge One LLC; 08-45330 (GFK) MGC Finance, Inc.; 08-45331 (GFK) PAC Funding, LLC; 08-45371 (GFK) Palm Beach Finance Holdings, Inc.) 08-45392 (GFK) Chapter 11 Cases Judge Gregory F. Kishel

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Plaintiff,

vs. ADV. NO. 10-04396

Westford Special Situations Master Fund, L.P.; et al.,

Defendants.

### CERTIFICATE OF SERVICE

I, Ma Xiong, declare, under penalty of perjury, that on January 28, 2011, I filed an **Amended Notice of Appearance and Request for Service Notices and Papers** with the Clerk of Bankruptcy Court through ECF, and that ECF will send an e-notice of electronic filing to the following:

Adam C Ballinger; aballinger@lindquist.com Daryle Uphoff; duphoff@lindquist.com

**Douglas A. Kelley, Trustee**; dkelley@kelleywolter.com

James A. Lodoen; jlodoen@lindquist.com Jeffrey D. Smith; jsmith@lindquist.com Kirstin D. Kanski; kkanski@lindquist.com Mark D Larsen; mlarsen@lindquist.com US Trustee; ustpregion12.mn.ecf@usdoj.gov

I further certify that I caused a copy of the foregoing document and the Notice of

Electronic Filing to be served by First Class Mail on the following parties:

**Capital Strategies Fund Ltd.** 

**Epsilon Active Value Fund II, Ltd.** 

Epsilon Global Active Value Fund I-B, Ltd.

**Epsilon Global Active Value Fund II-B, Ltd.** 

**Epsilon Global Active Value Fund II-G, Ltd.** 

**Epsilon Global Active Value Fund III Ltd.** 

**Epsilon Global Active Value Fund, Ltd.** 

Epsilon Global Master Fund III - Structured Strategies, L.P.

Stafford Towne, Ltd

**Westford Special Situations Fund Ltd.** 

**HWR Services Limited** 

Craigmuir Chambers

PO Box 71

Road Town, Tortola

British Virgin Islands

#### **Epsilon Global Active Value Fund II-G, L.P.**

National Registered Agents 160 Greentree Drive, Suite 101 Dover, DE 19904

**Epsilon Global Active Value Fund III Ltd** 

**Epsilon Global Master Fund III - Structured Strategies, L.P.** 

c/o Steve Goran Stevanovich

7521 Isla Verde Way

Delray Beach, FL 33446

**Epsilon Global Asset Management, Ltd.** 

Epsilon Global Master Fund II, L.P.

**Epsilon Global Master Fund L.P.** 

Westford Global Asset Management, Ltd.

Westford Special Situations Master Fund, L.P.

Maples and Calder

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# **Epsilon Investment Management, LLC Westford Asset Management, LLC**First Canadian Place

First Canadian Place 100 King Street West Suite 5715 Toronto M5X 1 A9 Ontario Canada

**Stafford Towne, Ltd.** 7280 W. Palmetto Park Road Boca Raton, FL 33433

Dated: January 28, 2011	/e/ Ma Xiong
•	Ma Xiong

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